

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT LEXINGTON

Garey E. Lindsay, Regional Director of
the Ninth Region of the National Labor
Relations Board, for and on behalf of
the National Labor Relations Board

Petitioner,

vs.

Leggett & Platt, Inc.,

Respondent.

Civil Action No. 5:17-198-KKC

Judge Karen K. Caldwell

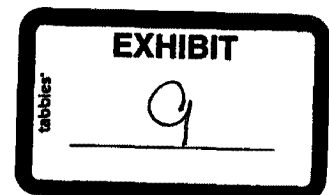
DECLARATION OF MICHAEL ROBINSON

I, Michael Robinson, hereby depose and stated as follows:

1. I am making this declaration voluntarily. I understand that my position at Leggett & Platt, Inc. ("Company") is in no way affected by me making this declaration. I have not been promised anything of benefit by Company for making this declaration, and I have not been threatened by Company in any way in connection with this declaration. I was assured by Company that I was free to give this declaration or not, without promise of benefit, threat of reprisal or any other impact on my employment. I understand that this declaration concerns the circumstances surrounding the signing of a pro-union petition, and may be introduced into evidence in a case between the Company and the NLRB.

2. I work at the Company's Winchester plant (plant #002), and have been represented by the International Association of Machinists Union, Local 619 ("Union").

3. I saw a notice on the Union's bulletin board at the plant announcing a meeting scheduled for January 18, 2017 at the Union hall to discuss strike pay and insurance benefits during a strike. This posting has since been taken down. I attended the meeting. At the meeting, I signed the document attached as Exhibit A because I understood that I had to sign it in order to get strike pay and insurance benefits. The document I signed on January 18 did not state, "We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc." at the top of the page. Rather, the top of



the page was blank. It appears to me that the language at the top of the page on Exhibit A was added after I signed it.

I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed in the county of Clark, State of Kentucky, on this 22 day of May 2017.



Michael Robinson

JOHNNIE'S POULTRY STATEMENT

1. My name is John Harper. I am an attorney representing Leggett & Platt.
2. I would like to ask you some questions relating to an unfair labor practice charge and associated legal proceedings alleging that the Company is unlawfully refusing to bargain with the Union.
3. You are not obligated to talk to me. If you talk to me and answer my questions, it will be entirely voluntary on your part. Your job at Leggett & Platt will in no way be affected by whether you talk to me or do not talk to me. Furthermore, regardless of your decision, there will be no prejudice or benefit to you. You will not be penalized or discriminated against in any way by Leggett & Platt, and you will not receive any benefit from Leggett & Platt, by reason of any answers you may give me. You also may decide to answer only part of my questions, and you can terminate our discussion at any time you wish. Again, there will be no penalties, retaliation or benefit of any kind based on your decision.
4. If you answer my questions, you should know that I want to know only the exact truth from your answers. Please do not give me an answer you think I would like to hear. Instead tell me the exact truth whether or not you think I would like it.
5. I do not want to know whether you are for the Union or against the Union or whether or not you are supportive of any effort to decertify the Union. I would merely like to know the facts about the events that I have mentioned.

ACKNOWLEDGMENT BY EMPLOYEE

The undersigned hereby declares that I have read the above, and that I am giving a true and correct statement in this matter entirely of my own free choice without any type of force or coercion on the part of Leggett & Platt or its lawyer.

Dated: 5-22-, 2017

Michael Robinson